

REMARKS

Applicants have carefully reviewed and considered the current Office Action and the reference(s) cited therein. Claims 1, 3-4, 6-7, 9-10, 12-13, 15-16, and 18-20 were pending in this application. Claims 1, 3-4, 7, and 9-10 are herein amended; Claims 13, 15-16, 18-20 are herein canceled; and no claims are herein added. As a result, Claims 1, 3-4, 6-7, 9-10, and 12 are now pending in this application.

Rejection of Claims 1, 3-4, 6-7, 9-10, 12-13, 15-16, and 18-20 under 35 U.S.C. §103

The Examiner has rejected Claims 1, 3-4, 6-7, 9-10, 12-13, 15-16, and 18-20 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2001/0050914 issued to Akahane et al. ("Akahane") in view of Applicant's admitted prior art ("AAPA"). Applicants respectfully traverse the rejection.

Applicants assert that the present invention, as claimed, is patentable over Akahane taken alone or in combination with AAPA. All the now pending claims require the execution of a single IP stack to receive packets from any of the router interfaces. Neither Akahane nor AAPA teach or suggest this limitation.

Akahane, on the other hand, teaches multiple IP stacks. Each Lower Layer Processor (53 and 54) with its corresponding Packet Layer Processor (52) constitutes an IP stack and each IP stack in Akahane has its own VPN Identification Table / Routing Table Look-up Processor (102), which is analogous to the Routing Managers ("RTMs") (161 and 162) described in relation to FIG. 2 of the present specification. Each IP stack in Akahane only receives packets from a subset of the router's interfaces. For example, FIG. 4 in Akahane shows each IP stack having access to two interfaces. The IP stack comprising Lower Layer Processor 53 receives packets from Interface Numbers 1 and 2, while the IP stack comprising Lower Layer Processor 54 receives packets from Interface Numbers 3 and 4. Accordingly, Akahane does not teach or suggest a single IP stack capable of receiving packets from any of the router interfaces. Akahane is exactly the type of prior art configuration described in the present invention in FIG. 2 and accompanying text. As explained in Paragraph 9 of the present invention, "[A]lthough the use of multiple routing tables and IP stacks ensures privacy in routing information for each address domain, running multiple IP stacks on one physical router

20 nevertheless limits the router's ability to scale." The present invention mitigates scalability issues by effectively replacing the multiple RTMs running on multiple IP stacks with a single domain manager executing a single IP stack.

Neither Akahane or AAPA teaches or suggests the above-describe limitation required by all currently pending claims. Accordingly, Applicants respectfully request this rejection be withdrawn.

CONCLUSION

Applicants respectfully submit that the claims are in condition for allowance and notification to that effect is earnestly requested. If the Examiner believes that a telephone conversation with the Applicants' representative would facilitate prosecution of this application in any way, the Examiner is cordially invited to telephone the undersigned at (508) 303-2003. If necessary, please apply any additional fees, or credit overpayments, to Deposit Account 50-2295.

Respectfully submitted,

Date: June 30, 2006
Reg. No.: 37,548

Tel. No.: (508) 303-2003
Fax No.: (508) 303-0005

/Stanley Hill/
Stanley K. Hill
Attorney for Applicant(s)
Guerin & Rodriguez, LLP
5 Mount Royal Avenue
Marlborough, MA 01752